

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

COOK COUNTY, ILLINOIS;
THOMAS DART, COOK COUNTY
SHERIFF (in his official capacity);
TONI PRECKWINKLE, COOK COUNTY
BOARD PRESIDENT (in her official capacity);
COOK COUNTY BOARD OF
COMMISSIONERS (in their official capacity),

Defendants.

No. 10 C 2946

Judge Richard Posner

Judge Virginia Kendall

Judge Sharon Johnson Coleman

**MOTION TO ENTER A SINGLE CUMULATIVE PRISONER RELEASE
ORDER PURSUANT TO 18 U.S.C. § 3626 and F.R.C.P. 16(c)(2)(P)**

NOW COMES the Sheriff of Cook County, by and through his attorneys, Daniel F. Gallagher and Querrey & Harrow, Ltd., and pursuant to 18 U.S.C. § 3626 and F.R.C.P. 16(c)(2)(P) moves the Court to enter a Prisoner Release Order in the form attached hereto, and in support thereof, states as follows:

1. That the Three-Judge Panel entered several orders which ultimately resulted in the issuance of a Prisoner Release Order.
2. However, in order to comprehend the order, it is necessary to read the motions seeking the order and the three orders entered by the Three-Judge Panel.
3. The parties believe that this may result in confusion as to the exact terms of the order and its interpretation.

4. Under the circumstances, the Sheriff proposes that an order be entered in the form and substance as attached hereto and made a part hereof as Exhibit 1.

5. The parties agree that the entry of a cumulative prisoner release order will facilitate the just, speedy and inexpensive disposition of this matter.

WHEREFORE, the Sheriff respectfully moves the Court to enter the order in the form attached hereto and made a part hereof as Exhibit 1.

Respectfully submitted,

Thomas J. Dart,
Sheriff of Cook County

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